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USDA, Food Safety and Inspection Service

Docket No. 03-020P; FDMS Docket Number FSIS-2005-0023

03-020P

Comments on proposed rule:

03-020P-3

Bruce Cottingham

Why is there any need for FSIS to have an Accredited Laboratory Program at all? FSIS Laboratories themselves are accredited to ISO 17025 which is an internationally recognized standard for the competency of testing laboratories. It should suffice for food safety concerns that any laboratory accredited for a particular analysis to the same standard would produce accurate results.

I suggest the wording be changed to reflect this. Something along the lines of:

"The USDA/FSIS will recognize analytical results produced by any laboratory accredited for any given analysis provided that laboratory is accredited according to ISO 17025 for that analysis."

Everything else should be deleted. This would be the end of the whole thing and is the most logical solution for a program that has outlived its reason for being. Perhaps many years ago, when such accreditations were not available, there was some rationale for FSIS getting into the business of accrediting laboratories but that is not the case today.

The resources currently expended in administering this program could be directed at the proper function of the Food Safety and Inspection Service which is to protect the food supply. The net result would be that all laboratories providing results to FSIS would be held to exactly the same standard to which FSIS laboratories are held. This is a standard that is available to the general public and requires no expenditure on the part of the government.

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